

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Eddie B Bates, Jr., Debtor**

**Case No. 25-00216-KMS  
CHAPTER 13**

**RESPONSE**

COMES NOW, Debtor, by and through counsel, and responds to Creditor, 21<sup>st</sup> Mortgage Corporation's, as successor to United Community Bank (as successor to Reliant/ Reliant Bank/ Reliant Bank MH) Motion for Relief from Stay and for Other Relief (dk # 42) as follows:

1. Debtor commenced this case on 01/28/2025 by filing a voluntary petition for relief under Chapter 13 of Title 11 of the United States Bankruptcy Code.
2. Debtor filed a Motion to Allow Payment Arrearage (Dk#51) due to his employer not deducting the plan payments.
3. The employer is now deducting the payments.
4. Debtor can continue making the plan payments.

WHEREFORE, Debtor prays for an Order denying the Motion and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

By: /s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr. (MSBN 103469)  
Attorney for Debtor

Of Counsel:  
Thomas C. Rollins, Jr. (MSBN 103469)  
Jennifer A Curry Calvillo (MSBN 104367)  
The Rollins Law Firm, PLLC  
P.O. Box 13767  
Jackson, MS 39236  
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601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Response was forwarded on July 15, 2025, to:

By USPS First Class Mail:

21<sup>st</sup> Mortgage Corporation  
P.O. Box 477  
Knoxville, TN 37901

By Electronic CM/ECF Notice:

David Rawlings

Edward E. Lawler, Attorney for Creditor

U.S. Trustee

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

Eddie B Bates, Jr.

CASE NO: 25-00216

**DECLARATION OF MAILING  
CERTIFICATE OF SERVICE**

Chapter: 13

On 7/15/2025, I did cause a copy of the following documents, described below,  
Response

to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if fully set forth herein.

Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been served electronically with the documents described herein per the ECF/PACER system.

DATED: 7/15/2025

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.

The Rollins Law Firm  
702 West Pine St  
Hattiesburg, MS 39401  
601 500 5533  
trollins@therollinsfirm.com

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI

IN RE:

Eddie B Bates, Jr.

CASE NO: 25-00216

**CERTIFICATE OF SERVICE  
DECLARATION OF MAILING**

Chapter: 13

On 7/15/2025, a copy of the following documents, described below,

Response

were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth herein.

The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of Service and that it is true and correct to the best of my knowledge, information, and belief.

DATED: 7/15/2025



Miles Wood  
BK Attorney Services, LLC  
d/b/a certificateofservice.com, for  
Thomas C. Rollins, Jr.  
The Rollins Law Firm  
702 West Pine St  
Hattiesburg, MS 39401

USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

FIRST CLASS

21ST MORTGAGE CORPORATION

P.O. BOX 477

KNOXVILLE TN 37901